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American Association of Motor Vehicle Administrators



Linda R. Levk
President and CEC

Betty L. Serian, Chair of the Board
Deputy Secretary for Safety Administration
Pennsylvania Department of Transportation

June 20, 2003

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket No. TSA-2003-14610 - 13
Docket No. FMCSA-2001-11117 - 26

Dear Sir or Madam:

On June 10th and 11th, the American Association of Motor Vehicle Administrators (AAMVA) hosted regional conference calls with its membership to discuss issues of concern with implementation of the interim final rule published May 5, 2003. The AAMVA community has very serious concerns about the implementation timeframe of the interim final rule, particularly in light of the fact that neither the technical specifications states' need to make necessary modifications to the Commercial Driver License Information System (CDLIS) have not been detailed nor have many of the other critical aspects of the credentialing and background check procedures.

If it is the intention of TSA to require state motor vehicle agencies to take fingerprints, almost all neither has that capability nor the funds to assume that responsibility. Furthermore, if it comes to pass that states are not in compliance by November 3, 2003, administrators may advise their state officials of the liability associated with issuing HAZMAT endorsements to potential terrorists and recommend that their state cease such issuance until they are able to come into full compliance with the interim final rule. This could potentially have an adverse effect on the transport of hazardous materials throughout the country.

While our members stand ready to do their part to fulfill the will of Congress, until all relevant decisions have been made and communicated to the states, it is impossible to do so. Therefore, we ask that you employ a technical amendment to the interim rule to move the compliance date from

An International Safety Association of Motor Vehicle and Law Enforcement Administrators

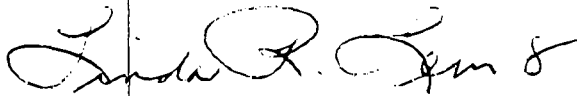
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November 3rd to allow TSA and FMCSA adequate time to develop well-thought-out system specifications and credentialing procedures. If this were not possible, then, we would ask that states be indemnified from all liability until such time as they were able to come into full compliance.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda R. Lewis", with a stylized flourish at the end.

Linda R. Lewis
President and Chief Executive Officer

cc: Asa Hutchinson, Undersecretary for Board & Transportation Security, USDHS
Tom Blank, Assistant Administrator, Transportation Security Policy
Steve Sprague, Branch Chief, Highway Infrastructure, TSA
Dion Casey, Legal Counsel, Office of Chief Counsel, TSA
Bruce J. Brotman, Director, Credentialing Program Office, TSA
Angela L. Heim, Deputy Director, Stakeholder & Industry Affairs, TSA
John Grimm, Director, Office of Safety Programs, FMCSA
Valerie Height, Regulatory Development Division, FMCSA